

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

TENNESSEE STATE CONFERENCE OF)	
THE NAACP et al.,)	
)	
Plaintiffs,)	No. 3:23-cv-00832
)	
v.)	JUDGE RICHARDSON
)	MAGISTRATE JUDGE NEWBERN
WILLIAM B. LEE, et al.,)	
)	
Defendants.)	
)	

**JOINT MOTION FOR EXTENSION OF TIME TO FILE RESPONSE
TO PLAINTIFFS’ COMPLAINT**

Plaintiffs Tennessee State Conference of the NAACP, League of Women Voters of Tennessee, The Equity Alliance, Memphis A. Philip Randolph Institute, African American Clergy Collective of Tennessee, Judy Cummings, Brenda Gilmore, Ophelia Doe, Freda Player, and Ruby Powell-Dennis (collectively “Plaintiffs”) and Defendants William B. Lee, in his official capacity as Governor of the State of Tennessee, Tre Hargett, in his official capacity as Secretary of State of the State of Tennessee, Mark Goins, in his official capacity as Coordinator of Elections for the State of Tennessee, the State Election Commission, and Donna Barrett, Judy Blackburn, Jimmy Eldridge, Mike McDonald, Secondra Meadows, Bennie Smith, and Kent Younce, in their official capacities as members of the State Election Commission (collectively “Defendants”), jointly move this Court for an Order acknowledging that Defendants accepted service of Plaintiffs’ Complaint on August 10, 2023 and granting Defendants 60 days to file a response to Plaintiffs’ Complaint. No undue delay will be incurred by the Court or the Parties as a result of the extension

because a scheduling order has not yet been entered. Given the above, the Parties move this Court to enter the attached Proposed Agreed Order. (See Attachment "A," Proposed Agreed Order).

Dated: August 15, 2023

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Counsel for Plaintiffs
**Pro hac vice pending*

CERTIFICATE OF SERVICE

I hereby certify that on August 15, 2023, the undersigned filed the foregoing document via this Court's electronic filing system, which sent notice of such filing to the following counsel of record:

COUNSEL OF RECORD	PARTY REPRESENTED
<p>Phillip F. Cramer Sperling & Slater 150 3rd Avenue South, Suite 1100 Nashville, TN 37201 Tel.: 312-224-1512 pcramer@sperling-law.com</p> <p>Jon Greenbaum* Ezra D. Rosenberg* Pooja Chaudhuri* Lawyers' Committee for Civil Rights Under Law 1500 K Street NW, Suite 900 Washington, DC 20005 Tel.: 202-662-8600 jgreenbaum@lawyerscommittee.org erosenberg@lawyerscommittee.org pchaudhuri@lawyerscommittee.org</p> <p>Jeffrey Loperfido* Mitchell D. Brown* Southern Coalition for Social Justice 1415 West Highway 54, Suite 101 Durham, NC 27707 Tel.: 919-323-3380 jeffloperfido@scsj.org mitchellbrown@scsj.org</p>	<p>Plaintiffs Tennessee State Conference of the NAACP, League of Women Voters of Tennessee, The Equity Alliance, Memphis A. Philip Randolph Institute, African American Clergy Collective of Tennessee, Judy Cummings, Brenda Gilmore, Ophelia Doe, Freda Player, and Ruby Powell-Dennis</p>

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<p>Ryan Nicole Henry (BPR# 40028) Assistant Attorney General Office of the Tennessee Attorney General P.O. Box 20207 Nashville, Tennessee 37202 (615) 532-2935 ryan.henry@ag.tn.gov</p> <p>Adam K. Mortara (BPR# 40089) Lawfair LLC 40 Burton Hills Blvd., Suite 200 Nashville, TN 37215 (773) 750-7154 mortara@lawfairllc.com</p>	<p>Defendants William B. Lee, in his official capacity as Governor of the State of Tennessee, Tre Hargett, in his official capacity as Secretary of State of the State of Tennessee, Mark Goins, in his official capacity as Coordinator of Elections for the State of Tennessee, the State Election Commission, and Donna Barrett, Judy Blackburn, Jimmy Eldridge, Mike McDonald, Secondra Meadows, Bennie Smith and Kent Younce, in their official capacities as members of the State Election Commission</p>

/s/ Ryan Nicole Henry
RYAN NICOLE HENRY (BPR# 040028)
Assistant Attorney General

Counsel for Defendants

Attachment “A”

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Plaintiffs,)	No. 3:23-cv-00832
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PROPOSED AGREED ORDER

This matter comes before the Court on the Parties’ joint motion for extension of time to file a response to Plaintiffs’ Complaint. The Court, having been sufficiently advised, takes notice that Defendants accepted service of Plaintiffs’ Complaint on August 10, 2023. Further, the Court **GRANTS** the motion and **ORDERS** that Defendants shall file a pleading or motion responsive to Plaintiffs’ Complaint on or before **Tuesday, October 10, 2023**.

Dated this ____ day of _____, 2023.